

What are the Information Needs of Communities & Citizens? Firstly, thank you all for taking the time to listen to the citizenry regarding their media needs in the future of this country.

In Wilmington, Ohio, where trust in big corporations and in big government is at an all time low, MSNBS and FOX News offer neither quality nor unbiased news in which the electorate can either make or debate important public policy decisions. What we need is a way for local citizens to get quality news and to debate this information in a public forum. In Cincinnati, there is a robust (yet deeply threatened) community media/public access center in where the citizens get to put their own diverse viewpoints on local television, with call-in shows and the like, in order to spur debate, participate in the electoral process, and move the issues facing all of America forward. We do not have this in Wilmington, and our small community is the worse for it.

How is Commercial Media Serving Your Community?

There is no real local commercial media serving my community. We have one newspaper, woefully inadequate, called The Wilmington News Journal, which is so partisan and in the pocket of a small special few that it is practically useless to the bulk of the community. Most people do not have a decent internet connection, this coupled with the text heavy nature of the internet makes it a very difficult venue for people to get the information that they need to make informed decisions.

Public policy initiatives that would improve commercial media in Wilmington, Oh would be to mandate the creation of Public Access Television (ruling on FCC docket 09-13 in the fastest possible timeframe would be of great assistance), to increase infrastructure to roll out broadband, and to prevent undisclosed corporate contributions to electoral advertising are just a few.

What is the State of Noncommercial, Nonprofit, and Public Media?

Community media is dying by inches. With the passage of SB117 in Ohio, community media centers are getting crushed. Funding has been a corrosive issue with organizations like these for decades; now, as subscriber fees over the franchise fees have been eliminated do to this industry-writin legislation, many organizations will die through defunding and attrition as companies such as AT&T, Verizon, Time Warner, and Comcast, reclaim this bandwidth, ignoring the public interest, to increase profit margins. There is little sense of community responsibility in this, and quite frankly, it is disgusting. Bandwith is the digital public square, and while I understand a profit motive, maintaining a slice for the public is immeasurably important, to each individual community, as well as to the 1st Amendment of the United States Constitution. THERE ARE NO FIRST AMENDMENT PROTECTIONS ON PRIVATELY OWNED NETWORKS! I wish people would attempt to understand the magnitude of this. The internet !

is only free because Community Media Provided the backstop of 1st Amendment protections. When Community Media Centers and Public Access Television is gone, so goes freedom of speech.

What is the Impact of the Internet and Mobile Information?

The internet, if one can afford the connection, is most definitely a great SUPPLEMENTARY source of news and information. As of now, information via the world wide web and its social networks is a hermetically sealed affair; one's friend and one's family and their close contacts are the source of information. These people are the most likely to think similarly to one another. Debate is less than "optimal" for good informed and diverse electoral decision making.

Below please find a more formal letter that I have modified and lay in this last field. This letter entirely reflects my views on the subject, though put down much more formally than I am able on my own.

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of  
The Future of Media and Information  
Needs of Communities in a Digital Age

GN Docket No. 10-25]

Comments of [Name of Center]

#### I. Introduction

I am filing these comments in support of the Comments of the National Association of Telecommunications Officers and Advisors and to congratulate the Federal Communications Commission (â€œCommissionâ€) for recognizing that Public, Educational and Governmental (â€œPEGâ€ or â€œpublic accessâ€) channels must be part of any discussion on the future of media and information needs of communities in a digital age. I believe this venue is important to political discourse in the United States of America

PEG channels fill unique community needs such as providing local citizens the information they need to lead safe productive lives in their communities. Local programming in Cincinnati had shows regarding the pitfalls of the mortgage crisis in 2005, well ahead of commercial media. Unless the Commission actively encourages development of public access, there is no guarantee that public access will remain in our future. In these comments I will answer the specific questions posed in

Question 27 of the Public Notice regarding PEG. These comments contain two sections. First, I share a common message as a member of the Alliance for Community Media, feel is imperative to call to the Commission's attention. Next, I will offer insights specific to our community to support our answers to Question 27.

## II. Summary of Challenges

PEG is currently facing significant challenges that include but are not limited to:

- Operators abusing state franchise legislation to limit or sunset traditional sources of PEG support, resulting in PEG centers closing across the nation;
- Operators employing state franchise laws to limit or sunset the availability of PEG channels, resulting in community voices being silenced;
- Operators refusing to treat PEG channels in the same way they treat local broadcast channels, resulting in the loss of audience and shared community communications. Among the practices that have made it more difficult for consumers to find and view PEG channels are: operators that move channels them to less desirable channel locations, operators that require consumers to obtain additional equipment to view PEG channels, or operators that aggregate PEG channels on a technically deficient video stream, which lacks the functionality of commercial channels; and
- The Commission's delay in addressing a number of PEG community petitions for declaratory rulings to restrict the above complained of industry practices.

The Commission must understand that its inaction as much as the abusive actions of others is jeopardizing the future of community programming. The Commission was once the champion of community programming, and we hope that this docket signals the Commission's return to that role.

## III. Responses to Specific PEG Questions Posed by the Commission:

I offer the following answers to the specific questions outlined in the FCC's Public Notice.

A. PEG channels are being used to effectively provide useful news and information to our community, but are threatened by industry practices and naïve state franchising legislation.

PEG channels are being used effectively in our community. For example, Predatory Lending was ahead of the American mortgage crises by 2 years. Because our PEG channels are programmed by the local community. I would answer the Commission's inquiry whether the Cincinnati PEG channels are being used as effectively as possible for the provision of useful news and information to communities in the affirmative.

I appreciate that programming could always be more effective if more of the population involves itself in the programming decisions. More efforts could be made in this regard if programmers were assured funding and our channels were not subject to industry efforts to marginalize our programming, for example by moving our channels around, requiring consumers to purchase/lease equipment to see our channels, or aggregating and streaming our channels with limited functionality.

The closest local channels to Wilmington, Ohio are those of Media Bridges in Cincinnati. Funding in the current model for Media Bridges disappears in July of 2011. After this date, Cincinnati will no longer have a funded source of Public or Educational access. This is a tragedy.

B. PEG channels have evolved over time to retain their effectiveness and must continue to evolve to ensure effectiveness in the digital future

In response to the Commission's inquiry as to "How has the role of PEG channels changed over time, and how could their effectiveness be improved?" I offer the following: fund these programs as if you were funding the very lifeblood of this democracy.

C. Operators have employed statewide franchising regimes to negatively impact the number, composition and funding of PEG channels.

Laws imposing statewide franchising regimes have been devastating to PEG channels and PEG Centers. Some state franchising laws limit PEG channels to the maintenance of current channels regardless of future community needs or technological advancements. The worst state franchising laws sunset or outright eliminate PEG channels and PEG funding support.

In those states that preserve the number of PEG channels, the funding for PEG operations has typically been cut dramatically. And where PEG funding is available, the options that local franchising provided to use funds for operations by mutual consent no longer exists in light of the definitions outlined in the Commission's Section 621 order.

In our state, SB117 is taking its toll. Media Bridges, while still active, is being forced to plan for a scaled down version of itself that would provide few of the services it currently offers. The video production training, teaching people, at no cost to them, how to utilize the power of media making with current technology, would all but disappear: graphic design, web-page creation, video editing, all would become much less accessible to those who our mission it is to serve- those who have no access to the means and methods of production, the internet and all it offers, and more.

D. Operators have frustrated the intent of state franchising regimes in that they have not provided robust consumer choice, but have dramatically undermined PEG channels and PEG operations. The rationale for state franchising was ostensibly to promote the greater competition and lower consumer prices. But this experiment has largely failed, and PEG programming and PEG operations have suffered greatly as a result of this failed experiment. This should not be a surprise. Because state franchises are standardized and not negotiated to meet community needs, the states have imposed a one size fit all program. The result is that many communities have no real opportunity to have their PEG needs met. Additionally, the strength of the Cable Act was that it was flexible in permitting communities to demand more as their needs increased. The inflexible approach taken by

state franchising laws is antithetical to the notion in the Cable Act (and implicit in this proceeding on the future of media) that community needs change over time.

E. The digital age will offers opportunities to supplement PEG channels; however these digital advances cannot supplant the need for PEG channels.

Some argue that You Tube, the establishment of personal and public web pages and social websites, render traditional mass media unnecessary. These arguments are most often made by industry and their champions as a justification for escaping public obligations, and are a misrepresentation of the media landscape. It is interesting to note that while making these arguments, commercial interests are not abandoning the television platforms for the Internet. Commercial providers recognize that in an information economy, the ability to distribute by multiple means is the only way to serve the interests of your audience. What should community providers be denied their ability to continue to reach their audience in a format of the viewer's choosing?

New delivery platforms do not render traditional platforms obsolete. They allow consumers to choose the means by which they receive information and to allow each individual consumer to make different choices at different times. The model is not displacement but information everywhere. Should a content provider or "speaker" be limited to one platform be it the Internet, or mobile applications, or traditional broadcast channels a significant portion of the audience will not be reached. Today, the most effective and perhaps only means to the poor and non-English speaking audiences, communities that rely heavily on public, educational and government programming is by means of the television. The same is true of public participation in PEG programming. If the only way to speak is via the Internet, groups who wish to reach a mass audience on an issue of local public importance may not be able to communicate effectively. But the Commission is already well!

I am aware of this challenge following its hearings on localism.

Finally, community programming relies not only on programming outlets, but on programming centers. Even in the digital age there continues to be a strong need for public places where consumers can both receive and create appropriate local information that can be easily found. PEG operations ensure that there is a well-funded "public space" that consumers can easily reach across all media.

Therefore, the Commission must not accept the claims that alternative platforms reduce the need for PEG channels and PEG support. They are based on a misrepresentation of the nature of media. For while advances introduced by the digital age can offer additional platforms for sharing PEG programming, these additional platforms will never replace PEG channels so long as the television is the primary source of video communications in this nation.

#### IV. Conclusion

Public Educational and Governmental channels must not only be part of any discussion on the future of media and information needs of communities in a digital age, PEG must be a part of the digital age. The Commission must understand that that unless it actively encourages development of public access as it did in the 1970s, there is no guarantee that public access will remain in our future. And that would be a grave loss for communities around the country.